

June 22, 1993

GMP #30

MEMORANDUM

TO: District Directors
Environmental Health Managers
Environmental Health Supervisors
Environmental Health Specialists

THROUGH: Donald J. Alexander, Director
Division of Onsite Sewage and Water Services

FROM: Bob Custard, R.E.H.S., Project Manager
Office of Environmental Health Services

SUBJECT: Construction Standards for Existing Discharging Sewage
Treatment Systems Now Coming Under General Permit

Discharging sewage treatment systems serving single family homes which were permitted and/or constructed prior to adoption of the Alternative Discharging Sewage Treatment Regulations for Single Family Dwellings will come under the authority of the Discharging Regulations when those systems are registered under the Department of Environmental Quality's General Permit. Many of these systems, including those permitted under Health Department LHS-120 permits, those constructed before a permit was required, and those permitted under individual VPDES permits by the Water Control Board, lack components currently required by the Alternative Discharging Sewage Treatment Regulations for Single Family Homes.

Section 1.3 of the Discharging Regulations grandfathers the location of these discharging sewage treatment systems and waives the requirements for maintenance and monitoring contracts so long as the plant meets the effluent quality standards of the General Permit. However, § 1.3 does not waive the construction requirements found in the Discharging Regulations.

Some of these older systems lack chlorinators, contact chambers, dechlorinators, sampling ports, and/or post-aeration devices. Some of these systems are not operating properly and are not meeting the effluent quality standards of the General Permit.

When an existing discharging sewage treatment system is registered under the General Permit, and therefore comes under the authority of the Health Department's Discharging Regulations, the local health department should evaluate the condition of the system. The local Health Department should then require that an application for a construction permit to repair or modify the system be filed if the system is consistently not meeting the effluent quality standards of the General Permit or if significant components of a properly constructed treatment system are missing. Plans and specifications should be required if the repairs or modifications are technically complex or significant in scope. When the local health department is satisfied that the proposed repairs or modifications will bring the system into compliance with the General Permit and the Discharging Regulations, a construction permit should be issued.

As a minimum all systems should include a chlorinator, a contact chamber of adequate size with a sampling port or other access for measuring chlorine residual, a dechlorinator, and a sampling port or other access point from which a sample of the final effluent can be collected. All systems should be in good repair and capable of producing an effluent which meets the quality standards of the General Permit. Sampling ports for collecting samples of mixed liquor suspended solids (MLSS) should not be required unless the system is malfunctioning and measurement of the MLSS fraction is an important part of troubleshooting, monitoring, and maintaining the system. Existing systems lacking post-aeration should not be required to add post-aeration unless repairs or modifications in excess of fifty percent (50%) of the cost of the system are necessary.

Existing buried sand filters which are not discharging are being considered by the Discharge Task Force and will be addressed in a future GMP. Until such time as that GMP is issued, no action should be taken to require replacement of leaking buried sand filters which do not discharge with lined sand filters if the sand filter is otherwise functioning properly.

pc: Office of Environmental Health Services Staff

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Discharge - Enforcement - Existing Systems